

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JANE DOE,

Plaintiff,

vs.

VALLEY HEALTH SYSTEM, INC., d/b/a
THE VALLEY HOSPITAL, INC., VALLEY
HOME CARE, INC., VALLEY MEDICAL
GROUP,

Defendant.

CIVIL ACTION NO. 2:23-CV-00185

**STIPULATION AND ORDER
EXTENDING TIME TO ANSWER,
MOVE, OR OTHERWISE RESPOND
TO PLAINTIFF’S CLASS ACTION
COMPLAINT**

WHEREAS, on December 13, 2022, Plaintiff Jane Doe filed a Class Action Complaint commencing the above captioned litigation in the Superior Court of New Jersey, Law Division, Bergen County;

WHEREAS, Plaintiff effected service of the summons and complaint on Defendant Valley Health System, Inc. (named as “Valley Health System, Inc. d/b/a The Valley Hospital Inc., Valley Home Care Inc., Valley Medical Group”) (“Valley Health”) on December 14, 2022;

WHEREAS, Valley Health removed the action to this Court on January 13, 2023;

WHEREAS, based on the date of service of the summons and complaint and the date of removal, Valley Health’s current deadline to answer, move, or otherwise respond is January 20, 2023;

WHEREAS, Valley Health has requested an extension from the Clerk of the Court, pursuant to Local Civil Rule 6.1(b), to extend its time by 14 days to February 3, 2023;

WHEREAS, Plaintiff’s counsel has advised that Plaintiff intends to file a motion to remand the action back to state court;

WHEREAS, Valley Health intends to oppose Plaintiff's motion for remand and also intends to file a motion to dismiss;

WHEREAS, the Parties agree that, for the sake of judicial economy, briefing on Valley Health's expected motion to dismiss should occur after Plaintiff's expected motion to remand is decided by the Court provided that the action remains before this Court;

WHEREAS, no previous extensions have been sought from the Court other than the request for an extension filed under Local Civil Rule 6.1(b);

IT IS HEREBY STIPULATED AND AGREED, by and among the parties through their undersigned counsel, that Valley Health's time to answer, move or otherwise respond to the Class Action Complaint is hereby extended until thirty (30) days after Plaintiff's expected motion to remand is decided by the Court.

Dated: January 19, 2023

s/ Jason J. Rozger

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* Motions for Admission to be filed

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*Attorneys for Defendant Valley Health
System, Inc. (named as "Valley Health
System, Inc. d/b/a The Valley Hospital
Inc., Valley Home Care Inc., Valley
Medical Group")*

SO ORDERED: _____

Date: